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ABSTRACT

The basic objective of this investigation was to conduct an input-review of the 1968, 1972 and Title XX Federal Interagency Day Care Requirements (FIDCR) and to make inferences gleaned from the results as these relate to appropriate revisions. Respondents from a number of states were asked to review and comment on each requirement. The document includes sections on requirements for operators, for administering agencies, for in-home care and a section on the monitoring and enforcing of FIDCR. Each section contains general comments as well as a summary of reactions to individual section requirements. In general, most requirements were judged to be reasonable. (MS)

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A PUBLIC REVIEW IN FEDERAL REGION VI OF THE FEDERAL INTERAGENCY DAY CARE REQUIREMENTS

(Combined 1968, 1972 and Title XX FIDCR)

Southwest Federal Regional Child Development Task Force

of the

Southwest Federal Regional Children Youth Services Committee

April 1977
Dallas, Texas

PS 009349

Arkansas • Louisiana • New Mexico • Oklahoma • Texas

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A Public Review in Federal Region VI of the Federal Interagency Day Care Requirements[1] (combined 1968, 1972 and Title XX FIDCR)

I. Introduction

The basic objective of this investigation was twofold: (a) to conduct an input-review of the 1968, 1972 and Title XX Federal Interagency Day Care Requirements (FIDCR), and (b) to make inferences gleaned from the results as these relate to appropriate revisions.

The input-review was conducted under the direction of the chairperson of the Southwest Federal Regional Child Development Task Force, and five members of the Steering Committee, hereafter referred to as the FIDCR Review Committee.[2] In addition, the Task Force appointed a member from each of the five states in the region. These persons served as state liaison.[3] Each of these five members was charged with the responsibility of compiling a list of the people to review and provide input comments into the FIDCR.

The list from each state was examined by the FIDCR Review Committee, and approved in accordance with the extent to which the list represented the variety of categorical entities required to include a cross-section of reactions, including those of the membership of the Task Force itself. The constituent makeup of the latter includes 78 members from the five state region consisting in a diversity of related child care professions, advocates, providers and consumers from both the private and public sectors. The project director reproduced and disseminated all input-review materials. Over 700 copies of the materials were disseminated, with 306 timely returns meeting the deadline of March 25, 1977.

It is to be noted that the essential purpose of this document is to report the results of the input-review. This review is not a scientific study. However, this does not diminish its importance, because both the input and the reactions were made by those assumed to best know not only the conditions affecting child care but also the specifications in the FIDCR. In this manner, the project is consistent with the federal Administrative Procedures Act, as well as with the new HEW policy in regards to the process of developing regulations. That is, this process includes (a) the identification of issues and options, (b) the invitation of public comments, and (c) the evaluation of public comments. Public comments on proposals and issues are encouraged through town hall type meetings, hearings, and through the ten regional offices of HEW.

For the purpose of this project, the FIDCR Review Committee perceived written comments and reactions to be equally as valuable input as a public forum. The underlying assumption was that there would be FIDCR and that FIDCR would be based upon standards similar to those proposed in 1972.

II. Procedures

Each prospective respondent was given a copy of a draft of the FIDCR, which combined the 1968, 1972 and the Title XX requirements, and asked to review and comment on each requirement. Each respondent was also given a copy of the Review Guide, and directions for reacting and commenting on each requirement and item. The Guide was divided into four sections: (I) Requirements for Operators, (II) Requirements for Administering Agencies, (III) Requirements for In-Home Care, and (IV) Monitoring and Enforcement of FIDCR. The reviewers were first asked to indicate the extent to which they perceived the requirements under each section to be (a) "too strong," (b) "reasonable," (c) "too weak," or (d) "undecided." Second, they were asked to use the space opposite each requirement to write in comments or recommendations for that requirement. Then, they were asked to use the space provided at the end of each section to write in any general comments they desired to make relative to their overall impressions of the requirements in each section.

Section IV — Monitoring and Enforcing of FIDCR — was added to glean from the respondents their judgments relative to this responsibility. The choices included: (a) The Federal Government, (b) State Government, (c) Local Government, (d) Combination of these, (e) Other, and (f) No Opinion. Space was also provided for individual respondents to explain their choice(s).

The list of respondents includes persons in the following categories in the five states: (a) state licensing personnel, (b) state Title XX personnel, (c) colleges and universities, (d) providers of various types, (e) parents of children, (f) related organizations, (g) citizens, (h) elected officials, (i) federal, state and local agency personnel not included in a-h, and (j) personnel from planning and coordination mechanisms.

III. Analysis

The data were first analyzed and tabulated in terms of the responses under each differential of the "too strong" — "undecided" scale. These tabulations were placed on 30 charts representing each of the FIDCR. Then, each comment — specific and general — was analyzed and interpreted in accordance with its pertinent points of congruence, particularly as these related to those responses indicating that a requirement was either "too strong" or "too weak." In the same manner, the comments and recommendations to Section IV were categorized. The manner in which each comment or recommendation was categorized was determined by the number of input-reactions that were similar in content.

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[1]Dr. John W. Hollomon, President of the National Association of Child Care Administrators and Associate Professor at the University of Texas at San Antonio, and Dr. Michael A. Zaccaria, Executive Director of the Alliance of Child Development Associations, served as consultants, were responsible for the development of the materials, analyses of the results, and the writing of this report. Professor Allee Mitchell of Texas Southern University served as project director and coordinator.

[2]Members of the Steering Committee were Ruth Hubbard of the Louisiana Office of Early Childhood, chairperson; Lu Sager, a member of the Social Services staff of the Veterans Administration Hospital at North Little Rock, Arkansas; James Bohanon, Supervisor of Oklahoma State Licensing for Day Care; Mozell Houser, an independent day care provider from Oklahoma City; Jeannette Watson, Director of Early Childhood Development Division of the Texas Department of Community Affairs; and Bill Baca of the Children and Youth Committee for the State of New Mexico.

[3]Ms. Ruth Steinsiek for Arkansas; Ms. Linda Kremheller for Louisiana; Ms. Ann Beck and Ms. Janice Paster for New Mexico; Mozell Houser from Oklahoma; and Dr. Jerry Southard and Doyal Pinkard for Texas.

The analysis of the data collected is herein presented and discussed in the form of results, as these were tabulated, charted, categorized, and interpreted in accordance with each of the 28 FIDCR.[1] The last part of this document includes a list of recommendations, inferred from the results of this input-review, considered to be appropriate input into revisions of FIDCR.

IV. Results and Discussions

A summary of the results of the analysis of data is first presented in accordance with the number of respondents in each category by states, and in regard to the tabulated responses to each of the requirements in each of the FIDCR.

We intended to subject each requirement to rigorous scrutiny. Therefore, in the results the focus of attention is on any requirement for which 20% of the respondents in particular categories indicated that a requirement was either "too strong" or "too weak." Attention was also focused on any requirement for which 10% or more of the total sample indicated that such a requirement was too strong or too weak. After the presentation of the results for each requirement, specific and general comments or recommendations are presented as categorized, and in harmony with the particular requirement to which they refer.

The results yielded the input-reviews of 306 respondents from the five-state region. Chart 1 presents a breakdown by state and category of respondents. The number of respondents from each state ranged from 40 to 80, with an additional 10 from federal agencies. The respondents in each category, as represented by states, negated any meaningful attempt to make cross-state comparisons of responses. A close analysis of the responses revealed that there were no respondents in several categories from some states. Texas, for example, was the only state with a respondent in the category of "Provider of Special Services." Besides, a careful examination of the tabulated data prior to consolidation into the charts revealed no notable differences in responses across states, as these relate to the overall input-reviews of each requirement.

From Chart 1 a breakdown by state revealed that 55 (18%) of the respondents were from Arkansas, 71 (23.2%) from Louisiana, 40 (13.1%) from New Mexico, 50 (16.3%) from Oklahoma, and 80 (26.1%) from Texas. Another 10 (3.3%) of the respondents from Federal Agencies are not included in the data tabulated by states in Chart 1. A complete breakdown of the number of respondents in each of the 10 categories, by state, is also presented in Chart 1.

The following discussion is therefore in accordance with the data computed in the 30 charts, as these relate to the requirements of the three FIDCR sections. Chart 32 presents the data related to Section IV — Monitoring and Enforcing of FIDCR — as categorized in accordance with the congruent input in the responses of the 10 categories of respondents.

CHART 1 *Summary of Number of Respondents by State by Category*

CATEGORY	Arkansas	Louisiana	New Mexico	Oklahoma	Texas	Total
1. State Licensing	7	3	0	6	6	22
2. State Title XX	8	1	2	0	7	18
3. College/ University	5	10	6	9	5	35
4a. Provider HS	5	6	2	1	1	15
4b. Provider Proprietary	0	9	3	7	7	26
4c. Provider Non-profit	10	4	11	3	14	42
4d. Provider Special Services	0	0	0	0	1	1
5a. Parents HS	6	0	2	2	0	10
5b. Parents FF	0	18	0	0	4	22
5c. Parents Spec. Needs	0	2	0	0	1	3
6. Organizations	5	12	3	4	9	33
7. Citizens	3	3	5	4	5	20
8. Elected Officials	1	0	0	3	0	4
9a. Agencies Federal						10*
9b. Agencies State	4	0	2	5	9	20
9c. Agencies Local	0	2	0	2	2	6
10. Planning/ Coordination	1	1	4	4	9	19
Total Number	55	71	40	50	80	306
Total Percent	18.0%	23.2%	13.1%	16.3%	26.1%	

*10 respondents from Federal Agencies equals 3.3% of total sample, not included in state data.

[1]Thirty charts deal with FIDCR. Data on the requirement, Providing Sufficient Caregivers, are represented in three charts: Family Day Homes, Centers 1972 FIDCR, Centers Title XX FIDCR.

Section I: Requirements for Operators

Chart 2 presents the data related to meeting code requirements. This requirement contains only one item of evidence of satisfactory compliance. Two hundred and eighty three (92.5%) of the total sample indicated that this requirement was reasonable. Five (1.6%) felt that the requirement was too strong; 6 (2.0%) felt that it was too weak, and 12 (3.9%) were undecided. There were no pertinent significant written remarks concerning this requirement.

(A complete breakdown of the categorical responses to this requirement is presented in Chart 2, as is true in all subsequent charts. Only total numbers and percentages of total responses are presented here, as are presented in all subsequent charts.)

CHART 2 *I.A. Meeting Code Requirements*

EVERY DAY CARE FACILITY MUST MEET REQUIRED LOCAL AND STATE FIRE, SAFETY, SANITATION, AND LICENSING CODES AND REGULATIONS.

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	0	22	0	0	22
2. State Title XX	1	15	0	2	18
3. College/ University	0	33	0	2	35
4a. Provider HS	0	13	0	2	15
4b. Provider Proprietary	0	25	0	1	26
4c. Provider Non-Profit	1	41	0	0	42
4d. Provider Special Services	0	1	0	0	1
5a. Parents HS	0	9	0	1	10
5b. Parents FF	0	22	0	0	22
5c. Parents Special Needs	0	2	0	1	3
6. Organizations	2	27	4	0	33
7. Citizens	1	17	1	1	20
8. Elected Officials	0	4	0	0	4
9a. Agencies Federal	0	10	0	0	10
9b. Agencies State	0	19	0	1	20
9c. Agencies Local	0	5	1	0	6
10. Planning/ Coordination	0	18	0	1	19
Total Number:	5	283	6	12	306
Total Percent:	1.6%	92.5%	2.0%	3.9%	

Chart 3 presents the data related to ensuring safety of buildings and premises. This requirement contains 13 items of evidence of satisfactory compliance. Individuals apparently reacted to the overall statement, to which 267 (87.3%) of the total sample felt was a reasonable requirement; 9 (2.9%), too strong; 18 (5.9%), too weak; while 12 (3.9%) were undecided. A number of individuals made comments and recommendations about one or more of the 13 items as well as the general requirement. Each of the items of evidence of satisfactory compliance will be commented upon below if there were written pertinent comments and recommendations.

CHART 3

I.B. Ensuring Safety of Buildings and Premises

THE INDOOR AND OUTDOOR PREMISES OF A DAY CARE FACILITY MUST BE: FREE OF ENVIRONMENTAL HAZARDS, CLEAN AND COMFORTABLE

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	1	20	0	1	22
2. State Title XX	0	15	1	2	18
3. College/ University	1	27	6	1	35
4a. Provider HS	0	13	1	1	15
4b. Provider Proprietary	3	22	0	1	26
4c. Provider Non-Profit	0	40	2	0	42
4d. Provider Special Services	0	1	0	0	1
5a. Parents HS	0	10	0	0	10
5b. Parents FF	0	20	1	1	22
5c. Parents Special Needs	0	3	0	0	3
6. Organizations	3	29	0	1	33
7. Citizens	0	18	1	1	20
8. Elected Officials	0	4	0	0	4
9a. Agencies Federal	0	8	2	0	10
9b. Agencies State	0	16	3	1	20
9c. Agencies Local	0	6	0	0	6
10. Planning/ Coordination	1	15	1	2	19
Total Number:	9	267	18	12	306
Total Percent:	2.9%	87.3%	5.9%	3.9%	

Specific Comments: Item 3, which has a double statement dealing with an approved fire extinguisher being available and emergency lighting being available in case of power failure, is the first of these. Five individuals expressed the need for greater clarity. In addition, three individuals stated that one fire extinguisher was not enough for a center, while four individuals questioned the need for emergency lighting. Item 7, having to do with the evaluation of lead paint in facilities, had five individuals suggesting greater clarity. Item 9, dealing with a water system and adequate toilets and hand washing facility, had five individuals indicating a need for clearer definition. Item 12, dealing with space requirements per child, was responded to by 13 individuals, five who indicated that 35 sq. ft. per child was inadequate, while eight individuals suggested that it was too much, most of them indicating 25 or 30 sq. ft. should be sufficient. Three individuals made comments suggesting that facilities having group infant care should be required to have smoke detectors.

Chart 4 deals with duration of stay in day care. This requirement contains one item of satisfactory compliance and deals with a child not being in day care longer than the parents' working time plus travel time except in cases of emergency. Two hundred and forty-seven (80.7%) of the total sample felt that this requirement was reasonable; 26 (8.5%), too strong; 13 (4.2%), too weak; while 20 (6.5%) were undecided. About 40% of the Head Start parents felt that it was too strong.

CHART 4 *I.C. Duration of Stay in Day Care*
CHILDREN DO NOT REMAIN IN DAY CARE FOR LONGER PERIODS OF TIME THAN IS NECESSARY.

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	1	21	0	0	22
2. State Title XX	1	13	1	3	18
3. College/ University	4	25	4	2	35
4a. Provider HS	0	12	1	2	15
4b. Provider Proprietary	1	23	0	2	26
4c. Provider Non-Profit	5	34	2	1	42
4d. Provider Special Services	0	1	0	0	1
5a. Parents HS	4*	6	0	0	10
5b. Parents FF	0	22	0	0	22
5c. Parents Special Needs	0	3	0	0	3
6. Organizations	2	26	3	2	33
7. Citizens	2	16	0	2	20
8. Elected Officials	0	4	0	0	4
9a. Agencies Federal	0	8	1	1	10
9b. Agencies State	3	14	0	3	20
9c. Agencies Local	0	5	0	1	6
10. Planning/ Coordination	3	14	1	1	19
Total Number:	26	247	13	20	306
Total Percent:	8.5%	80.7%	4.2%	6.5%	

*Indicates 20% or more of a category.

Specific Comments: Nine individuals wrote comments indicating that parents needed some time to do family shopping or other chores occasionally. Three individuals indicated that children should not be subjected to day care for more than 10 hours a day.

Chart 5 deals with encouraging the continuing development of children. Five items comprise the evidence of satisfactory compliance. Two hundred and fifty-five (83.3%) of the total sample felt that this requirement was reasonable; 10 (3.3%), too strong; 27 (8.8%), too weak; while 14 (4.6%) were undecided.

CHART 5
I.D. Ensuring the Continuing Development of Children
EACH CHILD MUST BE PROVIDED WITH EXPERIENCE, ACTIVITIES, EQUIPMENT, GUIDANCE AND SUPPORT THAT:
CONTRIBUTE TO PHYSICAL AND EMOTIONAL DEVELOPMENT AND HEALTH. DEVELOP MENTAL ABILITIES IN SUCH AREAS AS LANGUAGE, NUMBERS, SPATIAL RELATIONS, ABSTRACTION AND MEMORY.
FOSTER INDIVIDUAL AND GROUP INTERACTIONS WHICH CONTRIBUTE TO GENERAL SOCIAL COMPETENCE.

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	0	19	3	0	22
2. State Title XX	0	18	0	0	18
3. College/ University	2	24	5	4	35
4a. Provider HS	0	10	2	3	15
4b. Provider Proprietary	1	24	0	1	26
4c. Provider Non-Profit	2	37	2	1	42
4d. Provider Special Services	0	1	0	0	1
5a. Parents HS	0	8	2*	0	10
5b. Parents FF	0	21	1	0	22
5c. Parents Special Needs	0	3	0	0	3
6. Organizations	1	28	3	1	33
7. Citizens	1	16	1	2	20
8. Elected Officials	1	3	0	0	4
9a. Agencies Federal	0	7	3*	0	10
9b. Agencies State	0	15	3	2	20
9c. Agencies Local	0	6	0	0	6
10. Planning/ Coordination	2	15	2	0	19
Total Number:	10	255	27	14	306
Total Precinct:	3.3%	83.3%	8.8%	4.6%	

*Indicates 20% or more of a category.

Specific Comments: Item #1 of satisfactory compliance on a written plan contains six portions dealing with curricular activities and equipment. Five individuals commented that these were too specific. On the other hand, 15 individuals suggested more specificity to the requirements in general. Two Head Start parents and three federal agency personnel, 20% and 30% respectively, commented that the general requirement was too weak.

Chart 6 presents data related to ensuring continuity with home and school. This requirement contains five items of satisfactory compliance. Two hundred and sixty-nine (87.9%) of the total sample felt that this requirement was reasonable; 9 (2.9%), too strong; 15 (4.9%), too weak; while 13 (4.2%) were undecided. Since special note is made of 20% or more of the respondents in any category indicating that a requirement is either too strong or too weak, it is notable that one of the four elected officials felt the requirement was too strong and that two of the ten representatives of federal agencies felt it was too weak.

CHART 6 *I.E. Ensuring Continuity with Home and School*
DAY CARE ACTIVITIES MUST:
COMPLEMENT AND SUPPLEMENT THE CHILD'S EXPERIENCES AT HOME AND IN SCHOOL
REFLECT RESPECT AND UNDERSTANDING OF THE PARENTS' DESIRES FOR THE CARE AND DEVELOPMENT OF THEIR CHILDREN

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	0	22	0	0	22
2. State Title XX	0	14	1	3	18
3. College/ University	1	30	3	1	35
4a. Provider HS	0	13	0	2	15
4b. Provider Proprietary	3	22	0	1	26
4c. Provider Non-Profit	1	37	1	3	42
4d. Provider Special Services	0	1	0	0	1
5a. Parents HS	0	9	1	0	10
5b. Parents FF	0	22	0	0	22
5c. Parents Special Needs	0	3	0	0	3
6. Organizations	3	28	2	0	33
7. Citizens	0	18	1	1	20
8. Elected Officials	1*	3	0	0	4
9a. Agencies Federal	0	8	2*	0	10
9b. Agencies State	0	17	2	1	20
9c. Agencies Local	0	6	0	0	6
10. Planning/ Coordination	0	16	2	1	19
Total Number:	9	269	15	13	306
Total Percent:	2.9%	87.9%	4.9%	4.2%	

*Indicates 20% or more of a category

Specific Comments: Written comments of three individuals indicated that there was too much specificity in Items 1 and 5 dealing with supplementing child's experiences at home and in school, and communication between school and caregivers respectively. Four individuals felt that the responsibilities of continuity with home and school should be those of parents, while another four indicated that center staff members should be able to communicate in child's language.

Chart 7 deals with ensuring adequate rest for children. Five items comprise satisfactory compliance. Two hundred and sixty-three (85.9%) of the total sample felt this requirement was reasonable; 2 (0.7%), too strong; 30 (9.8%), too weak; and 11 (3.6%) were undecided. About 10% of the state licensing personnel and 25% of the citizens felt it was too weak.

CHART 7 *I.F. Ensuring Adequate Rest for Children*
EACH CHILD MUST BE PROVIDED AN OPPORTUNITY FOR REST AND SLEEP APPROPRIATE TO HIS AGE AND TO THE LENGTH OF TIME AND TIME OF DAY THAT HE IS IN DAY CARE.

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	0	15	7*	0	22
2. State Title XX	0	16	0	2	18
3. College/ University	1	28	5	1	35
4a. Provider HS	0	12	1	2	15
4b. Provider Proprietary	1	22	2	1	26
4c. Provider Non-Profit	0	39	3	0	42
4d. Provider Special Services	0	1	0	0	1
5a. Parents HS	0	9	1	0	10
5b. Parents FF	0	22	0	0	22
5c. Parents Special Needs	0	3	0	0	3
6. Organizations	0	29	3	1	33
7. Citizens	0	15	5*	0	20
8. Elected Officials	0	4	0	0	4
9a. Agencies Federal	0	9	1	0	10
9b. Agencies State	0	16	2	2	20
9c. Agencies Local	0	6	0	0	6
10. Planning/ Coordination	0	17	0	2	19
Total Number:	2	263	30	11	306
Total Percent:	0.7%	85.9%	9.8%	3.6%	

*Indicates 20% or more of category.

Specific Comments: Sixteen individuals wrote comments suggesting that type of bedding acceptable such as cots, cribs and sleeping mats be specified.

Chart 8 deals with ensuring adequate nutrition. There are four items of satisfactory compliance. Two hundred and forty-eight (81.0%) of the total sample felt this requirement was reasonable; 11 (3.7%), too strong; 33 (10.7%), too weak; while 14 (4.6%) were undecided. It is notable that one of four elected officials felt it was too strong, while 20% or more of the following categories felt it was too weak: State Licensing, College/University, Federal Agencies and Planning/Coordination. Over 10% of the total sample also felt it was too weak.

CHART 8 *I.G. Ensuring Adequate Nutrition*
EACH OPERATOR MUST PROVIDE FOOD SERVICE FOR EACH CHILD THAT:
MEETS THE CHILD'S NUTRITIONAL NEEDS WHILE IN DAY CARE
COMPLEMENTS AND SUPPLEMENTS THE CHILD'S DIET AT HOME AND SCHOOL
RECOGNIZES PERSONAL, CULTURAL AND ETHNIC FOOD PREFERENCES
IS INTEGRATED INTO THE PROGRAM TO ENHANCE PHYSICAL, SOCIAL AND MENTAL DEVELOPMENT

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	1	16	5*	0	22
2. State Title XX	0	16	0	2	18
3. College/ University	0	24	8*	3	35
4a. Provider HS	0	11	0	4	15
4b. Provider Proprietary	2	21	2	1	26
4c. Provider Non-Profit	2	37	2	1	42
4d. Provider Special Services	0	1	0	0	1
5a. Parents HS	0	10	0	0	10
5b. Parents FF	0	21	1	0	22
5c. Parents Special Needs	0	3	0	0	3
6. Organizations	5	25	3	0	33
7. Citizens	0	18	2	0	20
8. Elected Officials	1*	3	0	0	4
9a. Agencies Federal	0	6	3*	1	10
9b. Agencies State	0	16	2	2	20
9c. AGencies Local	0	5	1	0	6
10. Planning/ Coordination	0	15	4*	0	19
Total Number:	11	248	33*	14	306
Total Percent:	3.7%	81.0%	10.7%*	4.6%	

*Indicates 20% or more of a category, 10% or more of the total sample.

Specific Comments: Thirty individuals wrote comments on Item #2 concerning nutritious meals. Their comments indicated a need for more specific definitions in terms of food, size of serving, and hot meals served. Three individuals indicated that two nutritious meals for children in day care nine hours or more were too demanding.

Chart 9 deals with sanitary food service. It contains five items of satisfactory compliance. Two hundred and seventy-six (90.2%) of the total sample felt that this requirement was reasonable; 2 (0.7%), too strong; 19 (6.2%), too weak; while 9 (2.9%) were undecided.

CHART 9 *I.H. Ensuring Sanitary Food Service*
THE FOOD AND DRINK SERVED BY DAY CARE OPERATIONS MUST BE:
CLEAN, WHOLSOME AND SAFE FOR HUMAN CONSUMPTION
STORED, PREPARED AND SERVED USING SANITARY METHODS AND EQUIPMENT

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	0	22	0	0	22
2. State Title XX	0	16	0	2	18
3. College/ University	0	31	3	1	35
4a. Provider HS	0	11	2	2	15
4b. Provider Proprietary	0	25	0	1	26
4c. Provider Non-Profit	0	41	1	0	42
4d. Provider Special Services	0	1	0	0	1
5a. Parents HS	1	8	1	0	10
5b. Parents FF	0	22	0	0	22
5c. Parents Special Needs	0	3	0	0	3
6. Organizations	1	29	3	0	33
7. Citizens	0	18	2	0	20
8. Elected Officials	0	4	0	0	4
9a. Agencies Federal	0	7	3	0	10
9b. Agencies State	0	16	2	2	20
9c. Agencies Local	0	5	1	0	6
10. Planning/ Coordination	0	17	1	1	19
Total Number:	2	276	19	9	306
Total Percent:	0.7%	90.2%	6.2%	2.9%	

Specific Comments: Written comments of six individuals felt that wholesome should be better explained, while four individuals stated that food should be subjected to local Health Department inspections.

Chart 10 presents the data related to preventing accidents. It contains two items of satisfactory compliance. Two hundred and sixty-eight (87.5%) of the total sample felt this requirement was reasonable; 22 (7.2%), too weak, and 16 (5.2%) were undecided. No respondent felt it was too strong. Three categories of respondents exceeded the 20% criterion who felt it was too weak: College/University experts, Elected Officials, and Federal Agencies.

CHART 10 *I.I. Preventing Accidents*

OPERATORS MUST ENSURE THAT THE DAY CARE PROGRAM AND PREMISES MINIMIZE THE RISK OF ACCIDENTAL INJURY TO THE EXTENT POSSIBLE.

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	0	20	2	0	22
2. State Title XX	0	16	0	2	18
3. College/ University	0	25	8*	2	35
4a. Provider HS	0	11	2	2	15
4b. Provider Proprietary	0	24	1	1	26
4c. Provider Non-Profit	0	39	2	1	42
4d. Provider Special Services	0	1	0	0	1
5a. Parents HS	0	10	0	0	10
5b. Parents FF	0	21	0	1	22
5c. Parents Special Needs	0	3	0	0	3
6. Organizations	0	29	2	2	33
7. Citizens	0	18	0	2	20
8. Elected Officials	0	3	1*	0	4
9a. Agencies Federal	0	7	2*	1	10
9b. Agencies State	0	18	0	2	20
9c. Agencies Local	0	5	1	0	6
10. Planning/ Coordination	0	18	1	0	19
Total Number:	0	268	22	16	306
Total Percent:	0.0%	87.6%	7.2%	5.2%	

*Indicates 20% or more of a category.

Specific Comments: Written comments of two individuals suggested a need for more specificity, as related to the condition and repair of equipment.

Chart 11 deals with ensuring care in emergencies. Eight items comprise satisfactory compliance. Two hundred and fifty-two (82.4%) of the total sample felt this requirment was reasonable; 6 (2.0%), too strong; 35 (11.4%), too weak, and 13 (4.2%) were undecided. Three categories exceeded the 20% criterion, considering it too weak. These included Elected Officials, Federal Agencies, and Local Agencies. It is notable that 35 individual respondents in the total sample are in excess of the established 10% criterion, thus a special note is made.

CHART 11 *I.I. Ensuring Care in Emergencies*

EVERY FACILITY MUST BE CAPABLE OF SAFEGUARDING EACH CHILD IN CASE OF INJURY OR ILLNESS, OR FIRE, FLOOD OR OTHER NATURAL DISASTER.

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	0	18	3	1	22
2. State Title XX	0	12	2	4	18
3. College/ University	1	28	5	1	35
4a. Provider HS	0	12	1	2	15
4b. Provider Proprietary	1	21	3	1	26
4c. Provider Non-Profit	0	40	2	0	42
4d. Provider Special Services	0	1	0	0	1
5a. Parents HS	0	10	0	0	10
5b. Parents FF	0	22	0	0	22
5c. Parents Special Needs	0	3	0	0	3
6. Organizations	2	25	6	0	33
7. Citizens	1	15	3	1	20
8. Elected Officials	0	3	1*	0	4
9a. Agencies Federal	0	8	2*	0	10
9b. Agencies State	1	15	2	2	20
9c. Agencies Local	0	4	2*	0	6
10. Planning/ Coordination	0	15	3	1	19
Total Number:	6	252	35*	13	306
Total Percent:	2.0%	82.4%	11.4%*	4.2%	

*Indicates 20% or more of a category, 10% or more of the total sample.

Special Comments: Thirty five individuals wrote comments on Item #1, suggesting that fire drills should be held more frequently than once yearly. For Item #2, four individuals commented that names and telephone numbers of parents and other human services agencies should also be accessible. For Item #3 — dealing with emergency medical treatment — 16 individuals commented that first aid training for at least one staff member should be required. For Item #8, four individuals mentioned that only medicine prescribed by a physician should be administered.

Chart 12 presents the data related to accounting for the supervision of children. Three items comprise satisfactory compliance. Two hundred and sixty-two (65.6%) of the total sample felt this requirement was reasonable; 4 (1.3%), too strong; 25 (8.2%), too weak; while 15 (4.9%) were undecided. Two categories exceeded the 20% criterion of being too weak: State Title XX personnel and Elected Officials.

CHART 12 *Accounting for Supervision of Children*

THE OPERATOR OR CAREGIVER MUST KNOW THE WHEREABOUTS AND ACTIVITIES OF EACH CHILD AT ALL TIMES TO A DEGREE:
APPROPRIATE TO THE DEVELOPMENT LEVEL OF THE CHILD.
CONSISTENT WITH THE PARENTS' DESIRE FOR IMMEDIATE SUPERVISION OF THEIR CHILD.

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	0	20	2	0	22
2. State Title XX	1	10	5*	2	18
3. College/ University	0	31	3	1	35
4a. Provider HS	0	10	2	3	15
4b. Provider Proprietary	0	25	0	1	26
4c. Provider Non-Profit	1	38	2	1	42
4d. Provider Special Services	0	1	0	0	1
5a. Parents HS	0	9	1	0	10
5b. Parents FF	0	22	0	0	22
5c. Parents Special Needs	0	3	0	0	3
6. Organizations	1	26	5	1	33
7. Citizens	1	16	2	2	20
8. Elected Officials	0	2	1*	1	4
9a. Agencies Federal	0	9	0	1	10
9b. Agencies State	0	18	1	1	20
9c. Agencies Loca	0	6	0	0	6
10. Planning/ Coordination	0	17	1	1	19
Total Number:	4	262	25	15	306
Total Percent:	1.3%	85.6%	8.2%	4.9%	

*Indicates 20% or more of a category.

Specific Comments: Written comments by 14 respondents on Item #3 indicated that there should be more specificity in relation to the provisions for safety of the environment. Three indicated that college degrees in Early Childhood Education were desireable for caregivers.

Chart 13 deals with providing sufficient caregivers in family day care homes. The number of children allowed to be cared for by each adult range from four to six, depending on the ages of the children. One hundred and ninety-one (62.5%) of the total sample felt this requirement was reasonable; 46 (15.5%) indicated it was too strong; 17 (5.5%) that it was too weak; while 52 (16.9%) were undecided. Five categories exceeded the 20% criterion for being too strong. These included Proprietary Providers, Providers of Special Services, Organizations, Citizens and Elected Officials. It is noteworthy that 46 (15%) individuals in the total sample felt that this requirement is too strong.

CHART 13 *I.L. Providing Sufficient Caregivers (Family Day Homes)*

EACH FACILITY MUST HAVE SUFFICIENT CAREGIVERS:
TO PROVIDE FOR THE EMOTIONAL AND INTELLECTUAL DEVELOPMENT OF EACH CHILD.
TO ENSURE INDIVIDUAL ATTENTION TO EACH CHILD AS NECESSARY.
TO PROVIDE FOR EACH CHILD'S PHYSICAL CARE AND PROTECTION.
FAMILY DAY CARE HOMES: Ratios of 1 adult to 4 to 6 children depending on children's ages.

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	4	16	1	1	22
2. State Title XX	2	12	0	4	18
3. College/ University	4	28	0	3	35
4a. Provider HS	2	8	1	4	15
4b. Provider Proprietary	9*	8	2	7	26
4c. Provider Non-Profit	5	26	3	8	42
4d. Provider Special Services	1*	0	0	0	0
5a. Parents HS	1	7	0	2	10
5b. Parents FF	0	16	1	5	22
5c. Parents Special Needs	0	3	0	0	3
6. Organizations	7*	19	3	4	33
7. Citizens	4*	10	3	3	20
8. Elected Officials	1*	2	0	1	4
9a. Agencies Federal	1	7	1	1	10
9b. Agencies State	1	12	2	5	20
9c. Agencies Local	1	4	0	1	6
10. Planning/ Coordination	3	13	0	3	19
Total Number:	46*	191	17	52	306
Total Percent:	15.0%	*62.5%	5.5%	16.9%	

*Indicates 20% or more of a category, 10% or more of the total sample.

Specific Comments: Written comments revealed that twenty one respondents felt that the ratios were too stringent unreasonable, and unrealistic. On the contrary, 10 respondents felt that they were too weak. Three individuals indicated that the ratios were confusing; while two stated that there was not enough flexibility. An additional two stated that the requirement disregards rural areas and their problems in obtaining staff. Thirty-three commented that the staff to children ratios were too stringent, impractical, or too costly. The majority of the respondents, expressing strong opinions, suggested the use of ratios used for state licensing. On the other hand, three individuals felt that the ratios were not stringent enough. Nine commented that the requirement was confusing; while five stated that the age scale was unrealistic. Three expressed that college degrees in Early Childhood Education were desirable.

Chart 14 deals with providing sufficient caregivers in day care centers, using the ratios for the proposed 1972 FIDCR. One hundred and fifty-nine (52.0%) of the total sample felt this requirement was reasonable; 83 (27.1%) considered it to be too strong; 16 (5.2%) judged it to be too weak; while 48 (15.7%) were undecided. Ten categories were in excess of the 20% criterion related to the requirement being too strong. These included both groups of State Personnel, all four groups of Providers, Organizations, Citizens, Elected Officials and Federal Agency Personnel. It is notable that 81 (27.1%) of individual respondents in the total sample represented an excess of the 10% established criterion.

CHART 14 *I.L. Providing Sufficient Caregivers: (Centers 1972 FIDCR[1])*

EACH FACILITY MUST HAVE SUFFICIENT CAREGIVERS:
TO PROVIDE FOR THE EMOTIONAL AND INTELLECTUAL DEVELOPMENT OF EACH CHILD.
TO ENSURE INDIVIDUAL ATTENTION TO EACH CHILD AS NECESSARY.
TO PROVIDE FOR EACH CHILD'S PHYSICAL CARE AND PROTECTION.

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	7*	10	1	4	22
2. State Title XX	5*	10	0	3	18
3. College/ University	6	22	2	5	35
4a. Provider HS	4*	10	0	1	15
4b. Provider Proprietary	20*	4	0	2	26
4c. Provider Non-Profit	12*	19	5	6	42
4d. Provider Special Services	1*	0	0	0	1
5a. Parents HS	0	8	0	2	10
5b. Parents FF	0	18	2	2	22
5c. Parents Special Needs	0	1	0	2	3
6. Organizations	13*	11	3	6	33
7. Citizens	7*	9	1	3	20
8. Elected Officials	1*	3	0	0	4
9a. Agencies Federal	2*	6	1	1	10
9b. Agencies State	1	12	0	7	20
9c. Agencies Local	1	4	0	1	6
10. Planning/ Coordination	3	12	1	3	19
Total Number:	83*	159	16	48	306
Total Percent:	27.1%*	52.0%	5.2%	15.7%	

[1]DAY CARE CENTERS
1 Caregiver for each:
3 infants — age 0 through 18 months
4 toddlers — age 19 months through 35 months
7 children — age 36 months through 53 months
10 children — age 54 months through 71 months
13 children — age 6 years through 8 years
16 children — age 9 years through 11 years
20 children — age 12 years through 14 years

*Indicates 20% or more of category, 10% or more of the total sample.

Specific Comments: Fifty-five individuals felt the ratios were either too stringent, unrealistic, unreasonable or too expensive, while four thought they were not stringent enough. Three suggested that college degrees in Early Childhood Education were desirable.

Chart 15 deals with providing sufficient caregivers under Title XX ratios. Some 113 (36.9%) of the total sample felt that this requirement was reasonable; whereas 131 (42.8%) considered it to be too strong; 15 (4.9%) judged it to be too weak; while 47 (15.3%) were undecided. At least 20% of all but two groups (Parents of Federally-funded Children and Parents of Children with Special Needs) felt the requirement was too strong.

CHART 15 *I.L. Providing Sufficient Caregivers (Centers Title XX FIDCR)*

EACH FACILITY MUST HAVE SUFFICIENT CAREGIVERS:
TO PROVIDE FOR THE EMOTIONAL AND INTELLECTUAL DEVELOPMENT OF CHILD.
TO ENSURE INDIVIDUAL ATTENTION TO EACH CHILD AS NECESSARY.
TO PROVIDE FOR EACH CHILD'S PHYSICAL CARE AND PROTECTION.
TITLE XX RATIOS (SEE CHART BOTTOM OF PAGE).

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	11*	7	1	3	22
2. State Title XX	10*	5	0	3	18
3. College/ University	11*	17	3	4	35
4a. Provider HS	8*	5	0	2	15
4b. Provider Proprietary	23*	0	0	3	26
4c. Provider Non-Profit	12*	22	2	6	42
4d. Provider Special Services	1*	0	0	0	1
5a. Parents HS	5*	4	0	1	10
5b. Parents FF	3	14	1	4	22
5c. Parents Special Needs	0	2	1	0	3
6. Organizations	16*	10	3	4	33
7. Citizens	10*	6	1	3	20
8. Elected Officials	2*	1	1	0	4
9a. Agencies Federal	3*	6	0	1	10
9b. Agencies State	4*	6	2	8	20
9c. Agencies Local	3*	2	0	1	6
10. Planning/ Coordination	9*	6	0	4	19
Total Number:	131*	113	15	47	306
Total Percent:	42.8%*	36.9%	4.9%	15.3%	

AGE OF CHILDREN	NUMBER OF CHILDREN PER CAREGIVER
Under 6 weeks	1
6 weeks to 3 years	4
Preschool three to 4 years	5
Preschool four to 6 years	7
School age six to 10 years	15
School age ten to 14 years	20

*Indicates 20% or more of a category, 10% or more of the total number.

Specific Comments: Written comments of 55 individuals mentioned that the ratios were either too expensive, too stringent, unreasonable, or unrealistic; while four individuals commented that they were not stringent enough. Three individuals suggested that college degrees in Early Childhood Development should be required.

Chart 16 presents the data related to ensuring competence of caregivers. It includes five items of satisfactory compliance. Two hundred and thirty (75.2%) of the total sample felt that this requirement was reasonable; 22 (7.2%), too strong; 34 (11.1%), too weak; while 20 (6.5%) were undecided. The two groups exceeding 20% indicating it was too strong were Proprietary Providers and Elected Officials; while those indicating it was too weak included five categories: College/University, Head Start Providers, Parents of Head Start children, Organizations and Elected Officials. It is noteworthy that 34 (11.1%) of individuals in the total sample exceeded the 10% criterion.

CHART 16

I.M. Ensuring Competence of Caregivers

EACH CAREGIVER MUST HAVE THE SKILL AND COMPETENCY NECESSARY TO CONTRIBUTE TO EACH CHILD'S PHYSICAL, INTELLECTUAL, PERSONAL AND SOCIAL DEVELOPMENT.

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	4	16	0	2	22
2. State Title XX	0	14	0	4	18
3. College/ University	0	23	9*	3	35
4a. Provider HS	0	10	4*	1	15
4b. Provider Proprietary	6*	17	2	1	26
4c. Provider Non-Profit	4	34	0	4	42
4d. Provider Special Services	0	1	0	0	1
5a. Parents HS	1	7	2*	0	10
5b. Parents FF	0	21	1	0	22
5c. Parents Special Needs	0	3	0	0	3
6. Organizations	1	24	7*	1	33
7. Citizens	3	13	3	1	20
8. Elected Officials	1*	2	1*	0	4
9a. Agencies Federal	0	9	0	1	10
9b. Agencies State	1	15	2	2	20
9c. Agencies Local	0	6	0	0	6
10. Planning/ Coordination	1	15	3	0	19
Total Number:	22	230	34*	20	306
Total Percent:	7.2%	75.2%	11.1%*	6.5%	

*Indicates 20% or more of a category, 10% or more of the total sample.

Specific Comments: Written comments of six individuals suggest a need for more training of staff members; while those of three other individuals suggest that at least an 8th grade reading ability be required.

Chart 17 presents the data dealing with the accountability of operators. It contains one item with six components as evidence of satisfactory compliance. Two hundred and sixty-four (86.3%) of the total sample felt this requirement was reasonable; 5 (1.6%), too strong; 24 (7.8%) felt it was too weak; while 13 (4.2%) were undecided. Two categories exceeded the 20% criterion of too weak: State Licensing and College/University.

CHART 17

I.N. Ensuring the Accountability of Operators

THE OPERATOR OF A DAY CARE FACILITY MUST HAVE:
THE SKILLS NECESSARY TO MANAGE A DAY CARE PROGRAM.
THE ABILITY TO RELATE EFFECTIVELY TO PARENTS AND THE COMMUNITY.
THE ABILITY AND WILLINGNESS TO PROVIDE A DEVELOPMENTAL CHILD CARE PROGRAM WHICH MEETS THE STANDARDS SET FORTH IN THESE REQUIREMENTS.

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	1	16	5*	0	22
2. State Title XX	0	14	1	3	18
3. College/ University	0	27	7*	1	35
4a. Provider HS	0	14	0	1	15
4b. Provider Proprietary	1	25	0	0	26
4c. Provider Non-Profit	1	37	1	3	42
4d. Provider Special Services	0	1	0	0	1
5a. Parents HS	1	9	0	0	10
5b. Parents FF	0	22	0	0	22
5c. Parents Special Needs	0	3	0	0	3
6. Organizations	1	24	6	2	33
7. Citizens	0	17	2	1	20
8. Elected Officials	0	4	0	0	4
9a. Agencies Federal	0	9	0	1	10
9b. Agencies State	0	17	2	1	20
9c. Agencies Local	0	6	0	0	6
10. Planning/ Coordination	0	19	0	0	19
Total Number:	5	264	24	13	306
Total Percent:	1.6%	86.3%	7.8%	4.2%	

*Indicates 20% or more of a category.

Specific Comments: The written comments of 13 individuals mentioned that there should be either more specificity of training requirements or a definition of component elements of a developmental program.

Chart 18 deals with ensuring a healthy staff. This requirement has two items for satisfactory compliance. Two hundred and sixty-eight (87.5%) of the total sample felt this requirement was reasonable; 5 (1.6%), too strong; 18 (5.8%) too weak; while 15 (4.9%) were undecided. The only Provider of Special Services also felt it was too weak.

CHART 18

I.O. Ensuring a Healthy Staff

DAY CARE STAFF CARING FOR OR COMING INTO CONTACT WITH CHILDREN MUST BE IN SUFFICIENT PHYSICAL AND MENTAL HEALTH TO SAFELY PERFORM THEIR ASSIGNED DUTIES
POSE NO THREAT TO THE PHYSICAL OR MENTAL HEALTH OF THE CHILDEN

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	1	20	0	1	22
2. State Title XX	0	14	1	3	18
3. College/ University	0	30	4	1	35
4a. Provider HS	0	14	0	1	15
4b. Provider Proprietary	0	23	3	0	26
4c. Provider Non Profit	0	40	0	2	42
4d. Provider Special Services	0	0	1*	0	1
5a. Parents HS	0	10	0	0	10
5b. Parents FF	0	22	0	0	22
5c. Parents Special Needs	0	3	0	0	3
6. Organizations	2	28	1	3	33
7. Citizens	0	17	2	1	20
8. Elected Officials	0	4	0	0	4
9a. Agencies Federal	0	8	1	1	10
9b. Agencies State	2	14	3	1	20
9c. Agencies Local	0	6	0	0	6
10. Planning/ Coordination	0	15	2	2	19
Total Number:	5	268	18	15	306
Total Percent:	1.6%	87.5%	5.8%	4.9%	

*Indicates 20% or more of category.

Specific Comments: Written comments of 12 individuals suggested that the mental health requirements for staff members need to be more clearly defined.

Chart 19 deals with admissions procedures. This requirement contains four items of satisfactory compliance. Two hundred and eighty (91.5%) of the total sample felt this requirement was reasonable; 7 (2.3%), too strong; 4 (1.3%), too weak; while 15 (4.9%) were undecided. It is to be noted that there were no pertinent written comments on this requirement.

CHART 19

I.P. Admissions Procedures

ADMISSION TO A DAY CARE FACILITY MUST:
BE NON-DISCRIMINATORY.
ASSURE INITIAL AND CONTINUING COMMUNICATION BETWEEN THE PARENTS AND THE OPERATOR AND CAREGIVER ABOUT THEIR MUTUAL RESPONSIBILITIFS
PROVIDE PAREN[illegible] WITH INFORMATION AND COUNSELING RE[illegible]RDING THE APPROPRIATENESS OF THE DAY CARE FACILITY FOR THEIR CHILD.

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	1	19	1	1	22
2. State Title XX	0	15	0	3	18
3. College/ University	0	33	0	2	35
4a. Provider HS	0	13	1	1	15
4b. Provider Proprie[illegible]ary	2	24	0	0	26
4c. Provider Non-Profit	2	39	0	1	42
4d. Provider Special Services	0	1	0	0	1
5a. Parents HS	0	9	1	0	10
5b. Parents FF	0	22	0	0	22
5c. Parents Special Needs	0	3	0	0	3
6. Organizations	1	30	0	2	33
7. Citizens	1	18	0	1	20
8. Elected Officials	0	4	0	0	4
9a. Agencies Federal	0	8	1	1	10
9b. Agencies State	0	19	0	1	20
9c. Agencies Local	0	6	0	0	6
10. Planning/ Coordination	0	17	0	2	19
Total Number:	7	280	4	15	306
Total Percent:	2.3%	91.5%	1.3%	4.9%	

Chart 20 presents the data related to ensuring parent participation in decision making. It contains three items of satisfactory compliance. Two hundred and four (66.7%) of the total sample felt this requirement was reasonable; 51 (16.6%), too strong; 14 (4.6%), too weak; while 37 (12.1%) were undecided. Six categories either included or exceeded the 10% criterion for the too strong in differential. These included State Licensing, State Title XX, Proprietary and Non-Profit Providers, Organizations and Elected Officials. It is notable that 51 individuals, or 16.6% of the total sample, exceeded the 10% criterion.

CHART 20

I.Q. Ensuring Parent Participation in Decision Making

PARENTS MUST BE GIVEN THE NECESSARY INFORMATION AND OPPORTUNITY TO BE INVOLVED IN THE POLICIES, GOALS, AND PROCEDURES OF THE DAY CARE PROGRAMS IN WHICH THEIR CHILDREN ARE ENROLLED.

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	5*	15	0	2	22
2. State Title XX	5*	10	0	3	18
3. College/ University	3	25	4	3	35
4a. Provider HS	0	10	2	3	15
4b. Provider Proprietary	8*	13	0	5	26
4c. Provider Non-Profit	15*	23	1	3	42
4d. Provider Special Services	0	1	0	0	1
5a. Parents HS	0	8	2	0	10
5b. Parents FF	0	18	2	2	22
5c. Parents Special Needs	0	3	0	0	3
6. Organizations	8*	19	1	5	33
7. Citizens	2	15	0	3	20
8. Elected Officials	1*	3	0	0	4
9a. Agencies Federal	0	8	0	2	10
9b. Agencies State	2	14	2	2	20
9c. Agencies Local	1	4	0	1	6
10. Planning/ Coordination	1	15	0	3	19
Total Number:	51*	204	14	37	306
Total Percent:	16.6%*	66.7%	4.6%	12.1%	

*Indicates 20% or more of a category, 10% or more of total sample.

Specific Comments: The written comments mentioned that parent participation in decision making encompasses a number of practical problems. Four individuals suggested that 50% parent participation was unrealistic. For Item #3, 13 individuals commented that the review and resolution of policies by councils should have more specific requirements. Sixteen individuals expressed that it should not be mandatory.

Summary of General Comments Written about Section I — Operator Requirements

Two individuals commented that the standard on meeting code requirements should be more specific.

Two expressed that the staff to children ratio should not be decreased.

Three suggested that the requirements should be specified as minimum requirements rather than maximum.

Four individuals recommended in deciding the staff to children ratio, consideration should be given to the capability of staff members to adequately care for children.

Six related that staff to children ratios should be based on state and local requirements, and

Four considered the federal child staff ratios requirements to be unrealistic and too costly.

Summary of Reactions to Individual Requirements for Operators.

Chart 21 summarizes reactions by percentage to individual requirements for operators. In excess of 75% of all respondents indicated that 15 of the 17 individual requirements were reasonable. The exceptions were those dealing with providing sufficient caregivers and ensuring parent participation in decision making. While there may be inferences for improving some of these 15 requirements, by and large they are felt to be reasonable. Those requirements generally felt to be reasonable included those dealing with codes, safety of facilities, duration of stay, continuing children's development, continuity with home and school, children's rest, nutrition and food, preventing accidents and care in emergencies, supervision of children, competency of caregivers, accountability of operators, ensuring a healthy staff and administrative procedures.

Providing sufficient caregivers for family day homes was felt to be reasonable by 62.5%, too strong by 15.0%, too weak by 5.5%, and undecided by 16.9% of the total sample. A number of individuals seem to feel that state requirements ought to be sufficient. It is pointed out that there is considerable variation among individual states of Region VI in terms of minimum requirements. If an attempt were made to allow more children per caregiver, we are not sure this would not increase the percentage of respondents indicating that they are too weak.

Providing sufficient caregivers for centers had two aspects, those of 1972 FIDCR and those of the Title XX FIDCR. While there was considerable reaction against the 1972 FIDCR, it was more pronounced against the Title XX FIDCR. For the children to staff ratios for the 1972 FIDCR, only 52.0% felt that they were reasonable, with 27.1% indicating they were too strong, 5.2% indicating they were too weak, and 15.7% being undecided. For the Title XX FIDCR, 42.8% indicated they were too strong in comparison to 36.9% indicating they were reasonable, 4.9% indicating they were too weak, and 15.3% being undecided.

The only other requirement posing some possible difficulty was the one dealing with parent participation. Of the total sample, 66.7% felt the requirement was reasonable, with 16.5% indicating it was too strong, 4.6% indicating it was too weak, and 12.1% being undecided. It is difficult to pinpoint a problem on this requirement. Perhaps more flexibility is needed in the means of parent participation and/or the percentage of parents paricipating.

Another interesting point dealing with the chart is that concerning the "Undecided" column. Except for those requirements dealing with providing sufficient staff and ensuring parent participation, the percentage being undecided raged from 2.6% to 6.5%. Ensuring parent participation yielded a 12.1% undecided as compared to those of 16.9%, 15.7% and 15.3% for providing sufficient caregivers for family day care homes, centers using 1972 FIDCRs, and centers using Title XX FIDCR, respectively. The high undecided may be an indication that some lack sufficient convincing evidence of information to make the other choices.

CHART 21

Summary Chart of Reactions by Percentage to Individual Requirements for Operators N=306

REQUIREMENT	Too Strong	Reasonable	Too Weak	Undecided
I.A. Meeting Code Requirements	1.6%	92.5%	2.0%	3.9%
I.B. Ensuring Safety of Buildings and Premises	2.9%	87.3%	5.9%	3.9%
I.C. Duration of Stay in Day Care	8.5%	80.7%	4.2%	6.5%
I.D. Ensuring the Continuing Development of Children	3.3%	83.3%	8.8%	4.6%
I.E. Ensuring Continuity with Home and School	2.9%	87.9%	4.9%	4.2%
I.F. Ensuring Adequate Rest for Children	0.7%	85.9%	9.8%	3.6%
I.G. Ensuring Adequate Nutrition	3.7%	81.0%	10.7%*	4.6%
I.H. Ensuring Sanitary Food Service	0.7%	90.2%	6.2%	2.9%
I.I. Preventing Accidents	0.0%	87.6%	7.2%	5.2%
I.J. Ensuring Care in Emergencies	2.0%	82.4%	11.4%*	4.2%
I.K. Accounting for Supervision of Children	1.3%	85.6%	8.2%	4.9%
I.L. Providing Sufficient Caregivers (Family Day Homes)	15.0%*	62.5%	5.5%	16.9%
(Centers 1972 FIDCR)	27.1%*	52.0%	5.2%	15.7%
(Center Title XX FIDCR)	42.8%*	36.9%	4.9%	15.3%
I.M. Ensuring Competence of Caregivers	7.2%	75.2%	11.1%*	6.5%
I.N. Ensuring the Accountability of Operators	1.6%	86.3%	7.8%	4.2%
I.O. Ensuring a Healthy Staff	1.6%	87.5%	5.8%	4.9%
I.P. Admissions Procedures	2.3%	91.5%	1.3%	4.9%
I.Q. Ensuring Parent Participation in Decision making	16.5%*	66.7%	4.6%	12.1%

*Indicates 10% or more of total sample responding too strong or too weak.

Section II: Requirements for Administering Agencies

Chart 22 presents the data in that part of Section II, which deals with ensuring compliance with requirements. It consists of three items of satistactory compliance. Two hundred and forty-three (79.4%) of the total sample felt this requirement was reasonable; 10 (3.3%), too strong; 31 (10.1%), too weak; whereas 22 (7.2%) were undecided. Only one category of personnel exceeded the 20% feeling it was too weak — Federal Agency. However, it is notable that 10.1% of the total sample exceeded the 10% criterion under the too weak differential.

CHART 22

II. A. Ensuring Compliance with Requirements — Administering Agencies

THE ADMINISTERING AGENCY MUST ARRANGE FOR SYSTEMATIC AND PERIODIC MONITORING OF FACILITIES AND PROGRAMS TO ENSURE CONTINUING COMPLIANCE WITH THESE REQUIREMENTS.

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	0	3	3	2	22
2. State Title XX	1	12	3	2	18
3. College/ University	0	26	6	3	35
4a. Provider HS	0	14	0	1	15
4b. Provider Proprietary	2	17	1	6	26
4c. Provider Non-Profit	2	37	2	1	42
4d. Provider Special Services	0	0	1	0	1
5a. Parents HS	0	10	0	0	10
5b. Parents FF	1	21	0	0	22
5c. Parents Special Needs	0	2	1	0	3
6. Organizations	1	26	6	0	33
7. Citizens	1	16	1	2	20
8. Elected Officials	1	3	0	0	4
9a. Agencies Federal	0	6	3*	11	0
9b. Agencies State	0	18	1	1	20
9c. Agencies Local	0	6	0	0	6
10. Planning/ Coordination	1	12	3	3	19
Total Number:	1;	243	31*	22	306
Total Percent:	3.3%	79.4%	10.1%*	7.2%	

*Indicates 20% or more of a category, 10% or more of total sample.

Specific Comments; Written comments reveal that for Item #1, 17 individuals expressed that more frequent than annual evaluations need to be made. For Item #2, 10 individuals commented that there should be required competencies of staff members in administering agencies. Four individuals suggested that there needs be more clarity relative to non-compliance.

Chart 23 deals with arranging health services. This requirement is comprised of six items of satisfactory compliance. Two hundred and ten (68.6%) of the total sample felt that this requirement was reasonable; 46 (15.0%), too strong; 11 (3.6%), too weak; while 39 (12.8%) were undecided. It is noteworthy that 42 individuals or 15.0% of the total sample exceeded the 10% criterion.

CHART 23

II.B. Arranging Health Services — Administering Agencies

THE ADMINISTERING AGENCY MUST ENSURE THAT EACH CHILD ENROLLED IN DAY CARE RECEIVES:
REGULAR HEALTH EVALUATION AND SUPERVISION SERVICES.
ASSISTANCE IN OBTAINING MEDICAL AND DENTAL TREATMENT FOR SIGNIFICANT PROBLEMS IDENTIFIED.

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	6*	12	0	4	22
2. State Title XX	1	14	1	2	18
3. College/ University	2	26	3	4	35
4a. Provider HS	2	8	2	3	15
4b. Provider Proprietary	5	16	0	5	26
4c. Provider Non-Profit	11*	25	1	5	42
4d. Provider Special Services	0	1	0	0	1
5a. Parents HS	3*	7	0	0	10
5b. Parents FF	0	20	1	1	22
5c. Parents Special Needs	0	3	0	0	3
6. Organizations	6	23	1	3	33
7. Citizens	3	15	0	2	20
8. Elected Officials	0	4	0	0	4
9a. Agencies Federal	1	7	0	2	10
9b. Agencies State	5*	12	0	3	20
9c. Agencies Local	0	6	0	0	6
10. Planning/ Coordination	1	11	2	5	19
Total Number:	46*	210	11	39	306
total Percent:	15.0%	*68.6%	3.6%	12.8%	

*Indicates 20% or more of a category, 10% or more of total sample.

Specific Comments: Written comments by 16 individuals suggested that arranging for health services should be the responsibility of parents; whereas seven commented that these should be the responsibility of the operator. Three expressed that health services are not always available in rural areas, while two mentioned the prohibitive cost, if donor funds remain mandatory.

Chart 24 presents the data dealing with arranging psychological and social services. This requirement has four items of satisfactory compliance. Two hundred and thirty-six (77.1%) of the total sample felt that this requirement was reasonable; 29 (9.5%), too strong; 7 (2.3%), too weak; whereas 34 (11.1%) were undecided. Two categories exceed the 20% criterion: Elected Officials and State Agencies. However, these categories indicated that if these services were provided and paid for by the federal government, the requirement would be reasonable.

CHART 24

II.C. Arranging Psychological and Social Services — Administering Agencies

THE ADMINISTERING AGENCY MUST ENSURE THAT:
BEHAVIOR AND LEARNING PROBLEMS OF CHILDREN IN DAY CARE ARE IDENTIFIED. PARENTS RECEIVE ASSISTANCE IN OBTAINING PSYCHOLOGICAL AND MENTAL HEALTH EVALUATION FOR THEIR CHILDREN AND IN OBTAINING TREATMENT FOR SIGNIFICANT PROBLEMS IDENTIFIED. PARENTS AND CAREGIVERS ARE INFORMED ABOUT AND HAVE ACCESS TO THE SOCIAL SERVICES AVAILABLE IN THE COMMUNITY.

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	3	17	0	2	22
2. State Title XX	0	15	0	3	18
3. College/ University	1	31	1	2	35
4a. Provider HS	1	10	2	2	15
4b. Provider Proprietary	2	20	0	4	26
4c. Provider Non-Profit	7	28	0	7	42
4d. Provider Special Services	0	1	0	0	1
5a. Parents HS	2	7	1	0	10
5b. Parents FF	0	21	1	0	22
5c. Parents Special Needs	0	3	0	0	3
6c. Organizations	2	28	1	2	33
7. Citizens	2	14	1	3	20
8. Elected Officials	1*	3	0	0	4
9a. Agencies Federal	1	8	0	1	10
9b. Agencies State	5*	13	0	2	20
9c. Agencies Local	0	6	0	0	6
10. Planning/ Coordination	2	11	0	6	19
Total Number:	29	236	7	34	306
Total Percent:	9.5%	77.1%	2.3%	11.1%	

*Indicates 20% or more of a category.

Specific Comments: Written comments were made by only eight respondents. Three of these suggested that such services should be the responsibility of the parents; while five expressed that the arrangement of such services should be the responsibility of the day care center operator. Four individuals recommended that the center staffs should be also trained in special education.

Chart 25 deals with providing training, and includes only one item of satisfactory compliance. Two hundred and twenty-six (73.9%) of the total sample felt that this requirement was reasonable; 11 (3.6%), too strong; 41 (13.3%), too weak; while 28 (9.2%) were undecided. It is to be noted that 41 individuals, or 13.3% of the total sample exceeded the 10% criterion.

CHART 25

II.D. Providing Training — Administering Agency

THE ADMINISTERING AGENCY MUST PROVIDE OR ARRANGE TRAINING AS MAY BE NECESSARY TO OFFER CAREGIVERS AND OPERATORS OPPORTUNITIES TO DEVELOP LEVELS OF COMPETENCE.

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	1	16	1	4	22
2. State Title XX	0	11	4*	3	18
3. College/ University	2	23	8*	2	35
4a. Provider HS	0	8	4*	3	15
4b. Provider Proprietary	2	18	1	5	26
4c. Provider Non-Profit	1	35	2	4	42
4d. Provider Special Services	0	1	0	0	1
5a. Parents HS	0	10	0	0	10
5b. Parents FF	0	21	1	0	22
5c. Parents Special Needs	0	3	0	0	3
6. Organizations	1	25	6	1	33
7. Citizens	1	12	6*	1	20
8. Elected Officials	2*	1	1*	0	4
9a. Agencies Federal	0	9	1	0	10
9b. Agencies State	0	15	3	2	20
9c. Agencies Local	0	5	1	0	6
10. Planning/ Coordination	1	13	2	3	19
Total Number:	11	226	41*	28	306
Total Percent:	3.6%	73.9%	13.3%*	9.2%	

*Indicates 20% or more of a category, 10% or more of total sample.

Specific Comments: Written comments of 29 individuals recommended that specific criteria be developed in connection with the training plan, while seven mentioned that training should be left to the discretion of the operator.

Chart 26 deals with ensuring parent participation in decision making, and contains only two items of satisfactory compliance. Two hundred and thirty (75.2%) of the total sample felt this requirement was reasonable; 24 (7.8%), too strong; 23 (7.5%), too weak; while 29 (9.5%) were undecided. Only two categories equalled or exceeded the criterion of 10% for too weak: Parents of Head Start and Local Agencies.

CHART 26

II.E. Ensuring Parent Participation in Decision Making — Administering Agency

PARENTS MUST BE GIVEN NECESSARY INFORMATION AND OPPORTUNITY TO ADVISE ON THE POLICIES, GOALS AND PROCEDURES OF THE DAY CARE ADMINISTERING AGENCY

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	2	17	1	2	22
2. State Title XX	2	13	1	2	18
3. College/ University	1	27	5	2	35
4a. Provider HS	0	10	2	3	15
4b. Provider Proprietary	4	17	0	5	26
4c. Provider Non-Profit	7	30	0	5	42
4d. Provicer Special Services	0	1	0	0	1
5a. Parents HS	0	7	2*	1	10
5b. Parents FF	0	17	2	3	22
5c. Parents Special Needs	0	3	0	0	3
6. Organizations	3	25	3	2	33
7. Citizens	1	17	1	1	20
8. Elected Officials	1	3	0	0	4
9a. Agencies Federal	0	9	1	0	10
9b Agencies State	2	13	4	1	20
9c. Agencies Local	0	5	1*	0	6
10. Planning/ Coordination	1	16	0	2	19
Total Number:	24	230	23	29	306
Total Percent:	7.8%	75.2%	7.5%	9.5%	

*Indicates 20% or more of a category.

Specific Comments: Written comments by five suggested a need for more specificity in the composition of an advisory group. Nine respondents mentioned that providing information to parents should be a routine matter; while eight expressed that it should depend on the individual operator.

Chart 27 presents the data dealing with ensuring transportation safety, which contains nine items as evidence of compliance. Two hundred and thirty-six (77.1%) of the total sample felt that this requirement was reasonable; 23 (7.5%), too strong; 18 (5.9%), too weak; while 29 (9.5%) were undecided. One group, Proprietary Providers, exceeded the criterion related to the requirement being too strong; while another category, Parents of Children with Special Needs, exceeded it for being too weak.

CHART 27

II.F. Ensuring Transportation Safety — Administering Agency

WHEN DAY CARE PROGRAMS PROVIDE OR ARRANGE FOR THE TRANSPORTATION OF CHILDREN, THE ADMINISTERING AGENCY MUST ENSURE:
ADEQUATE SUPERVISION AND PASSENGER RESTRAINTS FOR CHILDREN BEING TRANSPORTED.
USE OF SAFE VEHICLES AND DRIVING PRACTICES
AVOIDANCE OF EXCESSIVELY PROLONGED PERIODS SPENT RIDING IN VEHICLES.

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	3	16	0	3	22
2. State Title XX	0	14	2	2	18
3. College/ University	0	33	1	1	35
4a. Provider HS	1	11	0	3	15
4b. Provider Proprietary	6*	16	0	4	26
4c. Provider Non-Profit	5	28	3	6	42
4d. Provider Special Services	0	1	0	0	1
5a. Parents HS	0	9	1	0	10
5b. Parents FF	3	15	2	2	22
5c. Parents Special Needs	0	1	2*	0	3
6. Organizations	2	25	3	3	33
7. Citizens	2	16	1	1	20
8. Elected Officials	0	4	0	0	4
9a. Agencies Federal	0	10	0	0	10
9b. Agencies State	0	19	1	0	20
9c. Agencies Local	0	6	0	0	6
10. Planning/ Coordination Planning/	1	12	2	4	19
Total Number:	23	236	18	29	306
Total Percent:	7.5%	77.1%	5.9%	9.5%	

*Indicates 20% or more of a category.

General Comments for Section II Requirements for Administering Agencies

The following individual general written comments were made relating to:

A need for a clearer definition of duties and responsibilities for administering agencies.

A need for greater cooperation and sharing of responsibility between administering agency and parents.

The difficulty encountered for proprietary compliance.

Insufficient knowledge and clarity of requirements to appropriately respond.

Obligatory reporting of child abuse.

Summary of Reaction to Individual Requirements for Administering Agencies.

Chart 28 summarizes reactions by percentage to individual requirements for administering agencies. The percentage of the total group indicating that the six individual requirements are reasonable range from a low of 68.6% to a high of 79.4%. All six of the requirements for administering agencies which include compliance with requirements, health servcies, psychological and social services, providing training, parent participation in decision making, and transportation safety, appear to be generally reasonable. Arranging health services seems to generate the most controversy since 15.0% of the total sample feel it is too strong. The mild controversy on this requirement appears to deal with those responsibility it should be for arranging this service, whether it should be parent, operator, or administering agency.

CHART 28

Summary Chart of Reactions by Percentage to Individual Requirements for Administering Agencies N=306

REQUIREMENT	Too Strong	Reasonable	Too Weak	Undecided
II.A. Ensuring Compliance with Requirements	3.3%	79.4%	10.1%*	7.2%
II.B. Arranging Health Services	15.0%*	68.6%	3.6%	12.8%
II.C. Arranging Psychological and Social Services	9.5%	77.1%	2.3%	11.1%
II.D. Providing Training	3.6%	73.9%	13.3%*	9.2%
II.E. Ensuring Parent Participation in Decision Making	7.8%	75.2%	7.5%	9.5%
II.F. Ensuring Transportation	7.5%	77.5%	7.9%	9.5%

*Indicates 10% or more of total sample responding too strong or too weak.

Ensuring compliance with requirements, which was designated to be reasonable by 79.4%, was also indicated to be too weak by 10.1%. Reasons for it being indicated as too weak possibly have to do with the frequency of annual evaluations, competency of staff in administering agencies, and the employment of ensuring other means of compliance. The administering agency requirement of providing training was indicated to be reasonable by 73.9%, with 13.3% showing it to be too weak.

The "Undecided" column for the six requirements yielded percentages of 7.2% and 12.8%. It is noted that the undecided percentages tend to be somewhat higher than those for operator requirements — exclusive of parent participation and caregiver ratios.

Section III. Requirements for In-Home Care

Chart 29 deals with requirements for In-Home Care, or related ensurance of the competence of caregivers. Two hundred and eighteen (71.2%) of the total sample felt this requirement was reasonable; 17 (5.6%), too strong; 16 (5.2%), too weak; while 55 (18.0%) were undecided. It is notable that 2 (20%) of federal agency personnel felt the requirement too strong.

CHART 29

Section III. Requirements for In-Home Care.
I.M. Ensuring the Competence of Caregivers.
EACH CAREGIVER MUST HAVE THE SKILL AND COMPETENCY NECESSARY TO CONTRIBUTE TO EACH CHILD'S PHYSICAL, INTELLECTUAL, PERSONAL AND SOCIAL DEVELOPMENT.

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	3	11	2	6	22
2. State Title XX	2	13	0	3	18
3. College/ University	0	29	4	2	35
4a. Provider HS	0	11	1	3	15
4b. Provider Proprietary	2	19	0	5	26
4c. Provider Non-Profit	0	28	1	13	42
4d. Provider Special Services	0	1	0	0	1
5a. Parents HS	1	4	0	5	10
5b. Parents FF	0	16	1	5	22
5c. Parents Special Needs	0	3	0	0	3
6. Organizations	0	25	3	5	33
7. Citizens	3	14	2	1	20
8. Elected Officials	1	3	0	0	4
9a. Agencies Federal	2*	5	1	2	10
9b. Agencies State	2	14	1	3	20
9c. Planning/ Coordination	1	16	0	2	19
Total Number:	17	218	16	55	306
Total Percent:	5.6%	71.2%	5.2%	18.0%	

*Indicates 20% or more of a category.

Specific Comments: Written comments by 12 individual respondents mentioned that these requirements should be more clearly specified, and the specifications ought to stipulate competency-based performances.

Chart 30 presents the data dealing with providing training (In-Home). Two hundred and fifteen (70.3%) of the total sample felt that this requirement was reasonable; 9 (2.9%), too strong; 28 (9.2%), too weak; while 54 (17.6%) were undecided. It is notable that Elected Officials representing 25% of the respondents in this category felt this requirement was too strong.

CHART 30

Section III. Requirements for In-Home Care
II.D. Providing Training

THE ADMINISTERING AGENCY MUST PROVIDE OR ARRANGE TRAINING AS MAY BE NECESSARY TO OFFER CAREGIVERS AND OPERATORS OPPORTUNITIES TO DEVELOP HIGHER LEVELS OF COMPETENCE

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	0	12	2	8	22
2. State Title XX	0	13	2	3	18
3. College/ University	1	26	7*	1	35
4a. Provider HS	0	10	4*	1	15
4b. Provider Proprietary	1	20	0	5	26
4c. Provider Non-Profit	3	27	0	12	42
4d. Provider Special Services	0	0	1*	0	1
5a. Parents HS	1	4	0	5	10
5b. Parents FF	0	19	1	2	22
5c. Parents Special Needs	0	2	1*	0	3
6. Organizations	0	24	5	4	33
7. Citizens	0	13	4	3	20
8. Elected Officials	1*	2	0	1	4
9a. Agencies Federal	0	7	0	3	10
9b. Agencies State	0	17	0	3	20
9c. Agencies Local	0	6	0	0	6
10. Planning/ Coordination	2	13	1	3	19
Total Number:	9	215	28	54	306
Total Percent:	2.9%	70.3%	9.2%	17.6%	

*Indicates 20% or more of a category.

Specific Comments: Three written comments suggested that training should be leaned toward increasing levels of competency.

Chart 31 deals with arranging health services (In-Home Care). Two hundred and ten (68.6%) of the total sample felt this requirement was reasonable; 25 (8.2%), too strong; 7 (2.3%), too weak; while 64 (20.9%) were undecided.

CHART 31

Section III. Requirements for In-Home Care
II.B. Arranging Health Services

THE ADMINISTERING AGENCY MUST ENSURE THAT EACH CHILD ENROLLED IN DAY CARE RECEIVES:
REGULAR HEALTH EVALUATION AND SUPERVISION SERVICES
ASSISTANCE IN OBTAINING MEDICAL AND DENTAL TREATMENT FOR SIGNIFICANT PROBLEMS IDENTIFIED.

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	4	11	0	7	22
2. State Title XX	2	12	0	4	18
3. College/ University	1	29	2	3	35
4a. Provider HS	0	10	2	3	15
4b. Provider Proprietary	3	18	0	4	26
4c. Provider Non-Profit	6	23	0	13	42
4d. Provider Special Services	0	1	0	0	1
5a. Parents HS	1	4	0	5	10
5b. Parents FF	1	17	0	4	22
5c. Parents Special Needs	0	3	0	0	3
6. Organizations	2	22	1	8	33
7. Citizens	0	15	2	3	20
8. Elected Officials	0	3	0	1	4
9a. Agencies Federal	1	7	0	2	10
9b. Agencies State	3	15	0	2	20
9c. Agencies Local	0	6	0	0	6
10. Planning/ Coordination	1	14	0	4	19
Total Number:	25	210	7	64	306
Total Percent:	8.2%	68.6%	2.3%	20.9%	

Specific Comments: Written comments reveal that four individuals suggested arranging health services should be the responsibility of parents; while five expressed they should be left to the discretion of individual operators.

Chart 32 presents the data related to arranging psychological and social services (In-Home Care). Two hundred and seventeen (70.9%) of the total sample felt that this requirement was reasonable; 21 (6.9%), too strong; 5 (1.6%), too weak; while 63 (20.6%) were undecided. It is notable that 1 (25%) of the Elected Officials responding felt it was too strong.

CHART 32

Section III. Requirements for In-Home Care
II.C. Arranging Psychological and Social Services
THE ADMINISTERING AGENCY MUST ENSURE THAT:
BEHAVIOR AND LEARNING PROBLEMS OF CHILDREN IN DAY CARE ARE IDENTIFIED.
PARENTS RECEIVE ASSISTANCE IN OBTAINING PSYCHOLOGICAL AND MENTAL HEALTH EVALUATION FOR THEIR CHILDREN AND IN OBTAINING TREATMENT FOR SIGNIFICANT PROBLEMS IDENTIFIED.
PARENTS AND CAREGIVERS ARE INFORMED ABOUT AND HAVE ACCESS TO THE SOCIAL SERVICES AVAILABLE IN THE COMMUNITY

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	2	14	0	6	22
2. State Title XX	1	13	0	4	18
3. College/ University	1	31	0	3	35
4a. Provider HS	0	10	2	3	15
4b. Provider Proprietary	3	17	0	6	26
4c. Provider Non-Profit	6	23	0	13	42
4d. Provider Special Services	0	1	0	0	1
5a. Parents HS	1	4	0	5	10
5b. Parents FF	0	19	0	3	22
5c. Parents Special Needs	0	2	1	0	3
6. Organizations	1	24	1	7	33
7. Citizens	0	15	1	4	20
8. Elected Officials	1*	2	0	1	4
9a. Agencies Federal	1	7	0	2	10
9b. Agencies State	3	15	0	2	20
9c. Agencies Local	0	6	0	0	6
10. Planning/ Coordination	1	14	0	4	19
Total Number:	21	217	5	63	306
Total Percent:	6.9%	70.9%	1.6%	20.6%	

*Indicates 20% or more of a category.

Specific Comments: Written comments by six individual respondents suggested that arranging for psychological and social services should be the responsibility of parents.

Chart 33 deals with ensuring a healthy staff. Two hundred and forty-eight (81.1%) of the total sample felt this requirement was reasonable; 1 (0.3%), too strong; 7 (2.3%), too weak; while 50 (16.3%) were undecided. There were no written comments on this requirement.

CHART 33

Section III. Requirements for In-Home Care
I.O. Ensuring a Healthy Staff
DAY CARE STAFF CARING FOR OR COMING INTO CONTACT WITH CHILDREN MUST BE IN SUFFICIENT PHYSICAL AND MENTAL HEALTH TO:
SAFELY PERFORM THEIR ASSIGNED DUTIES.
POSE NO THREAT TO THE PHYSICAL OR MENTAL HEALTH OF THE CHILDREN.

CATEGORY	Too Strong	Reasonable	Too Weak	Undecided	Total
1. State Licensing	0	14	0	8	22
2. State Title XX	0	15	0	3	18
3. College/ University	0	32	2	1	35
4a. Provider HS	0	14	0	1	[illegible]
4b. Provider Proprietary	0	21	0	5	26
4c. Provider Non-Profit	0	29	0	13	42
4d. Provider Special Services	0	1	0	0	1
5a. Parents HS	0	5	0	5	10
5b. Parents FF	0	20	1	1	22
5c. Parents Special Needs	0	3	0	0	3
6. Organizations	1	27	0	5	33
7. Citizens	0	17	2	1	20
8. Elected Officials	0	3	0	1	4
9a. Agencies Federal	0	8	0	2	10
9b. Agencies State	0	16	2	2	20
9c. Agencies Local	0	6	0	0	6
10. Planning/ Coordination	0	17	0	2	19
Total Number:	1	248	7	50	306
Total Percent:	0.3%	81.1%	2.3%	16.3%	

Summary of General Comments on Section III — In-Home Care

The general comments written by individuals on this requirement included the following:

There is a need to define the duties and responsibilities of administering agencies.

The training requirements of caregivers should be more clearly specified.

The provision of health services to children should be the primary responsibility of parents, and that the arrangement of such services in the day care center should be left to the discretion of the center operator.

Summary of Reaction to Individual Requirements for In-Home Care.

Chart 34 summarizes reactions by percentage to individual requirements for in-home care. The five requirements for in-home care yielding percentages of reasonable responses range from 68.8% to 81.1%. These requirements deal with competence of caregiver, staff training, health, psychological and social services, and ensuring a healthy staff. None of these have indications of more than 9.2% saying they are either too weak or too strong. On the other hand, all have a relatively high undecided percentage, ranging from 16.3% to 20.9%. This may indicate that the respondents may lack evidence or information on these requirements to a higher degree than they do on other requirements.

CHART 34

Summary Chart of Reactions by Percentage to Individual Requirements for In-Home Care N=306

REQUIREMENT	Too Strong	Reasonable	Too Weak	Undecided
I.M. Ensuring the Competence of Caregivers	5.6%	71.2%	5.2%	18.0%
II.D. Providing Training	2.9%	70.3%	9.2%	17.6%
II.B. Arranging Health Services	8.2%	68.6%	2.3%	20.9%
II.C. Arranging Psychological and Social Services	6.9%	70.9%	1.6%	20.6%
I.O. Ensuring a Healthy Staff	0.3%	81.1%	2.3%	16.3%

Section IV: Monitoring and Enforcing of FIDCR

Chart 35 presents the responses related to monitoring and enforcing FIDCR. Reviewers were asked to assume that the FIDCR applies only to day care and childhood development programs supported by federal funds. They were asked to indicate which level of government or combinations thereof should be primarily responsible for monitoring and enforcing FIDCR. Reviewers were also asked to explain their opinions. Chart 35 therefore presents the results of the analysis of data both by category and by total number, including the total percentage making each choice among the 306 reviewers. The results revealed that 32 (10.5%) of the total sample indicated that the federal government should have this responsibility. Fifty-nine (19.3%) indicated it should be the state. Twenty (6.5%) felt that it should be the local government. One hundred and fifty-six (51.0%) felt that it should be a combination of local, state and federal governments. Nine (2.9%) indicated it should be the responsibility of others. Thirty (9.8%) had no opinon.

CHART 35

SECTION IV MONITORING AND ENFORCEMENT OF FIDCR

THE PRIMARY RESPONSIBILITY FOR MONITORING AND ENFORCEMENT OF FEDERAL REQUIREMENTS APPLICABLE TO CHILD CARE SERVICES SUPPORTED BY FEDERAL FUNDS.

Government: CATEGORY	Federal	State	Local	Combination	Other	No Opinion	TOTAL
1. State Licensing	4	9	0	6	0	3	22
2. State Title XX	0	8	0	8	0	2	18
3. College/ University	6	4	2	18	2	3	35
4a. Provider HS	4	1	0	7	0	3	15
4b. Provider Proprietary	0	10	1	11	1	3	26
4c. Provider Non-Profit	4	7	8	17	0	6	42
4d. Provider Special Services	0	0	0	1	0	0	1
5a. Parents HS	5	0	0	3	0	2	10
5b. Parents FF	1	1	3	17	0	0	22
5c. Parents Special Needs	0	1	0	2	0	0	3
6. Organizations	2	6	2	21	0	2	33
7. Citizens	2	5	1	9	0	3	20
8. Elected Officials	0	1	1	0	2	0	4
9a. Agencies Federal	0	1	0	8	0	1	10
9b. Agencies State	0	0	0	18	2	0	20
9c. Agencies Local	0	3	1	1	1	0	6
10. Planning/ Coordination	4	2	1	9	1	2	19
Total Number Selecting Response:	32	59	20	156	9	30	306
Total Percent Selecting Response:	10.5%	19.3%	6.5%	51.0%	2.9%	9.8%	

Explanations: Written comments explaining their opinion revealed the following:

Fifty-five individuals suggested that the monitoring and enforcing procedures should be conducted by the Welfare or Social Services Department of the state, which provides human services, and is knowledgeable about federal program requirements.

Fifty-five individuals expressed that the state and local governments are more in touch with community needs and resources.

Twenty individuals related that there should be consistency between state and federal governments.

Fifty-three individuals stressed that there should be some monitoring by the federal government of state regulatory records for centers receiving federal funds, including on-site visitations to day care centers.

V. Summary

This summary is based upon the input-review of a consolidated 1968, 1972 and Title XX FIDCR. A total of 306 respondents from the five state area of HEW Region VI provided inputs to the 17 requirements for operators, the 6 requirements for administering agencies, and the 5 requirements for in-home care. They also responded to an overall item on who should monitor and enforce the FIDCR. The sample included categories of individuals representing state licensing, state Title XX, colleges and universities, providers of various entities, parents of children in different federally funded programs, organizations, citizens, elected officials, agency personnel from federal, state and local governments, and those from planning and coordination mechanisms.

Requirements for Operators

Fifteen of the 17 individual operator requirements were judged to be reasonable. There were specific comments and suggestions to the improvement of a number of these.

A 10% criterion of total sample, indicating that a requirement was either too strong or too weak, made the requirement a special item of focus. Those requirements for which 10% of the total sample felt were either too strong or too weak are noted as follows:

1) Ensuring adequate nutrition was adjudged to be too weak by 33 individuals, or 10.7%, of the total sample.

2) Ensuring care in emergencies was indicated to be too weak by 38 individuals, or 11.4%, of the sample.

3) Providing sufficient caregivers for family day homes was indicated as being too strong by 46 individuals, or 15.0%, of the sample.

4) Providing sufficient caregivers in day care centers based upon the proposed 1972 FIDCR was judged to be too strong by 83 respondents, or 27.1%, of the sample.

5) Providing sufficient caregivers for day care centers using Title XX FIDCR was shown to be too strong by 132 individuals, or 42.8%, of the sample. (Some 113, or 36.9%, felt that they were reasonable).

6) Ensuring competence of caregivers was judged to be too weak by 34 individuals, or 11.1%, of the sample.

7) Ensuring parent participation in decision making was felt to be too strong by 51 individuals, or 16.6%, of the sample.

Requirements for Administering Agencies

All six requirements for administering agencies were judged by the total sample to be generally reasonable. Our criterion of 10% or more of the sample, indicating they were either too strong or too weak made three of these requirements areas of special note. Those that were considered either too strong or too weak by a sufficient minority follow:

1) Ensuring compliance with requirements was indicated by 31 individuals, or 10.1%, of the sample as being too weak.

2) Arranging health services was judged to be too strong by 46 individuals, or 15.0%, of the sample.

3) Providing training was judged to be too weak by 41 respondents, or 13.3%, of the sample.

Requirements for In-Home Care

The five requirements for in-home care were judged to be reasonable by the respondents of this review. There were no requirements for which any total sample showed a 10% or more, indicating the requirement was too strong or too weak. It is also noted that a relatively high percentage of total respondents, 16.3% to 20.9%, indicated they were undecided about these requirements. For the provider requirements, only those dealing with providing sufficient caregivers were relatively high, 15.3% to 16.9%, in the undecided category.

Monitoring and Enforcement of FIDCR

The last item of the survey asked individuals to indicate what level of government should have the responsibility for monitoring and enforcement of FIDCR applicable to child care services supported by federal funds. The data revealed that the respondents were unwilling to relegate this responsibility to any one level of government. Of the total sample of 306 persons, 156, or 51.0%, indicated that it should be a combination of levels of government. Thirty-two individuals, or 10.5%, felt the primary responsibility should be that of the federal government; 59 individuals, or 19.3%, felt the responsibility should be that of the state government; while 20 respondents, or 6.5%, felt the responsibility should be that of the local government. Those indicating "other" (9, or 2.9%), or "no opinion" (30, or 9.8%), comprised 39 respondents, or 12.7%, of the sample.

*VI. Inferences: Appropriate Input into FIDCR Revisions**

In keeping with the basic objective of this input-review of FIDCR — based upon the results of the data presented in this document — the following inferences are made. The order in which these are presented does *not* represent a priority listing.

1) There needs to be greater clarity related to the consequences of non-compliance with the FIDCR.

2) FIDCR should not be so rigid in exacting duties and responsibilities of the day care center, that the duties and responsibilities of parents are diminished. That is, the requirements should not be so encompassing, on the part of the day care operators, that they allow parents to abdicate their parental responsibilities.

3) More efficient and more realistic mechanisms need to be specified for parent participation in the decision-making process. While it is laudible to have parent participation in decision making, the requirement of a 50% parent participation needs to be reconsidered.

4) The enforcement of FIDCR should rest with the local and state government agencies, with the federal government monitoring the extent to which these agencies enforce federal requirements.

5) The double item dealing with a fire extinguisher and emergency lighting needs greater specificity and clarity. These may be less ambiguous if divided into two specific items rather than one because they are separate entities.**

6) Ensuring competence of caregivers is a requirement that needs attention. Public policy on this item is somewhat confusing.***

7) A need exists for specifying criteria related to requiring bedding, for pre-schoolers during the afternoon, such as types of cots, beds, or mats.

8) For ensuring adequate nutrition, a need exists for more specificity such as the number of hot meals required per week, and what constitutes a balanced meal.

9) As related to ensuring care in emergencies, more frequent fire drills need to be required; easily accessible names, addresses and telephone numbers of parents and human service agents and agencies need be required.

10) There is a need to reconsider the staff to children ratios of day care centers in light of the capability of child care providers, the state licensing standard ratios, local and regional conditions of the state-of-the-art and the law of greater goodness.****

11) There is a need to consider more frequent or other means than annual evaluations of facilities by administering agencies.

12) There needs to be more clarification of the role of parent, center and agency for the provision of health services.

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*Inferences were drawn from written comments and recommendations.

**Pertaining to fire extinguishers, day care centers may require several fire extinguishers. Specific types of extinguishers may be specified for kitchen areas versus other portions of a facility. As pertains to emergency lighting, it is questionable whether or not this should be one of exception rather than applying to all facilities. The original intent of emergency lighting was for high rise buildings that may have day care facilities above the first floor. If there were a power failure in such a situation, some form of lighting such as with high power flashlights would be necessary for the staff and children to see their way in exiting in any emergency. Procedures such as this would appear to be unnecessary for ordinary day care facilities unless they were built with no window lighting.

***On the one hand, child care experts, advocates, and operators are all saying we must improve the competence of the staff members. On the other hand, our legislators are saying that day care facilities should be a place of primary employment for welfare recipients. These two positions appear to be incompatible. Selection and training criteria should be towards developing competent caregivers. Welfare recipients should be selected and trained for those jobs in which they would be both competent and satisfied. In the meantime it might be suggested that staff members be required to attend certain numbers of hours of training each year.

****The law of greater goodness applies to a provision of intent and results. For example, child care advocates and experts may feel that we should provide the best possible care for the poor disadvantaged children. Thus a stringent staff to children ratio is implemented. Since funds might be limited, only a fraction of those children eligible are able to take advantage of those child care services that are provided. That is, some 8 to 10 other children of the same category are denied this care because the children in child care use up these funds. It can thus be argued that this requirement is unconstitutional and illegal since it does not allow the other poor children of the same category to participate because those few that are in the program have already used up the funds.

STUDY ABSTRACT

A PUBLIC REVIEW IN FEDERAL REGION VI Of The FEDERAL INTERAGENCY DAY CARE REQUIREMENTS (Combined 1968, 1972 and Title XX)

*by Jerry Southard**

The Child Development Task Force of the Southwest Federal Region (HEW VI) sponsored a survey review of the Federal Interagency Day Care Requirements during the first quarter of 1977. The study was designed to survey attitudes toward the acceptance of the federal requirements and determine how the requirements might be revised. The goal of the advisory Task Force was to afford the child care community in the southwestern states an opportunity to have specific input into the Federal (FIDCR) Appropriateness Study.

Task Force members from each of the five southwestern states were appointed to a Review Committee to monitor the study. Members of the Committee were Ruth Hubbard, Louisiana; Lu Sager, Arkansas; James Bohanon and Mozell Houser, Oklahoma; Bill Baca, New Mexico; and Jeannette Watson, Texas. The project was conducted under contract with Texas Southern University. Project Director-Coordinator was Allee Mitchell. Dr. Michael A. Zaccaria and Dr. John W. Hollomon were responsible for materials development, data analysis, and writing the final report.

More than seven hundred survey instruments were disseminated to a representative cross section of child care professionals, advocates, providers and consumers in both the public and private sectors. The survey materials included a Review Guide which combined the 1968, 1972 proposed, and Title XX Federal Interagency Day Care Requirements. The Guide was divided into four sections: Requirements for Operators; Requirements for Administering Agencies; Requirements for In-Home Care; and Monitoring and Enforcement of FIDCR.

Participants were asked to review each requirement in the Guide and indicate on a survey form whether the requirement was perceived to be "too strong", "reasonable", "too weak", or "undecided". Data were analyzed on the basis of responses according to the scale. Any requirement that was judged by 10% or more of the responses as being "too weak" or "too strong" was given special focus. Written comments and recommendations were used in drawing inferences for each requirement. The study report is based on 306 responses returned in time to be included in the data analysis.

Fifteen of seventeen requirements for operators were found to be reasonable by more than two-thirds of the respondents. The requirement regarding child-staff ratios had the least amount of agreement. Only 36.9% found the Title XX staff ratios for day care centers to be reasonable while 42.8% felt they were too strong. The 1972 proposed FIDCR ratios for centers, which until now had not been made public, were judged to be reasonable by 52% of the respondents but 27.1% felt they were too strong. Even though 62.5% judged the child-staff ratios for family day homes to be reasonable, 15% indicated they were too strong.

The requirement for operators insuring parent participation in decision-making was accepted as reasonable by two-thirds of those replying. Even though 16.6% felt the requirement for parent participation in decision-making was too strong, comments indicated that parents should be involved in decision-making regarding the daily program that directly affects their children. Requiring the policy making group for administrative and budget decisions to be composed of 50% parents was thought to be too strong.

Other requirements found to be reasonable by more than two thirds but judged to be too weak by more than 10% were nutrition, ensuring care in emergencies, and ensuring competence of caregivers.

All six requirements for administering agencies were judged by more than two-thirds of the respondents to be generally reasonable. More than 10% pointed out that ensuring compliance and provision for staff training requirements were too weak. Fifteen percent felt "arranging health services" was too strong.

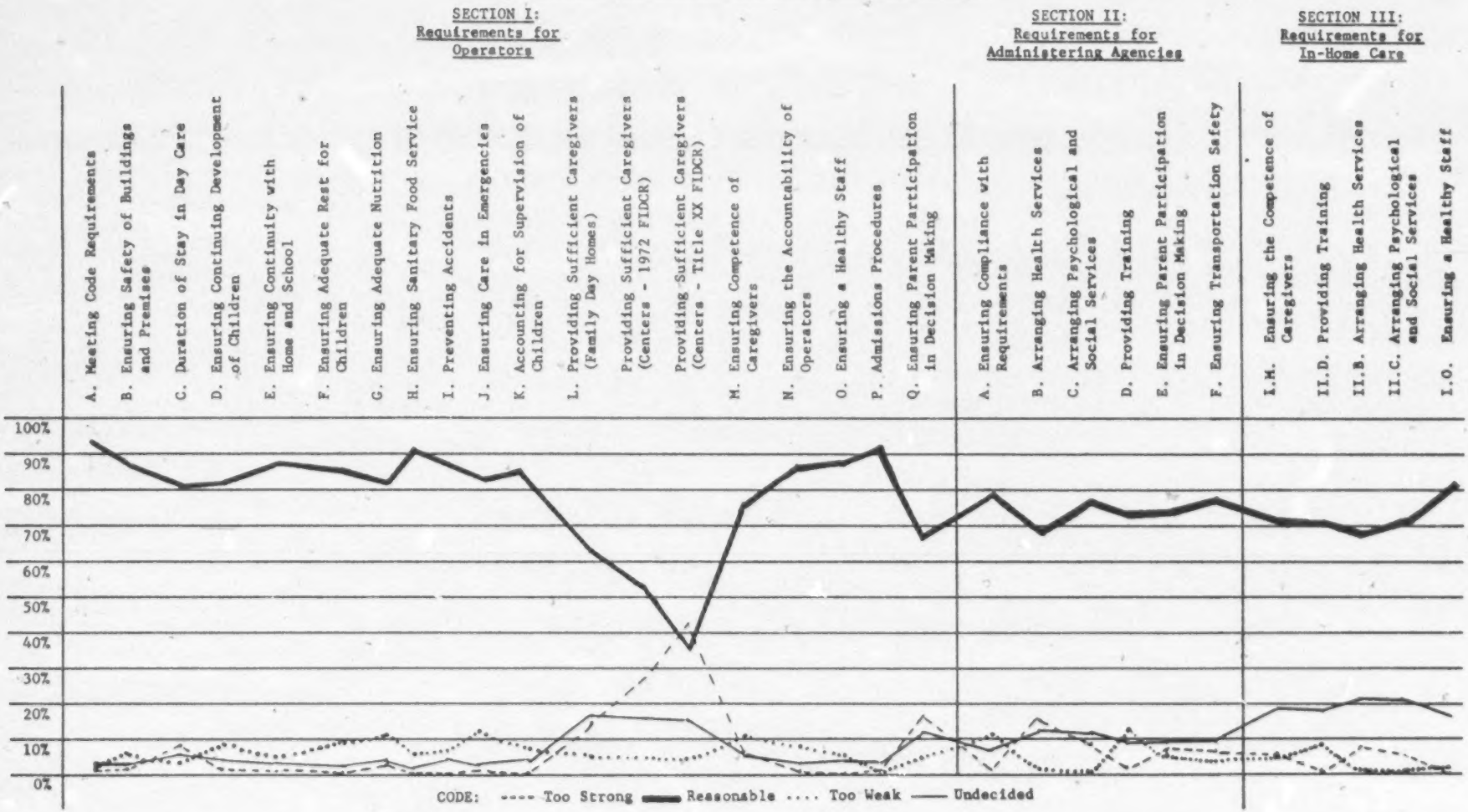
The five requirements for in-home care were judged by more than two-thirds of the respondents to be reasonable. It was noted that there were more "undecided" responses to these requirements than any other.

The last item of the survey asked individuals to indicate what level of government should have the responsibility for monitoring and enforcement of FIDCR applicable to child care services supported by Federal funds. The data revealed that the majority of respondents were unwilling to relegate this responsibility to any one level of government. More than 50% indicated it should be a combined local, state, and federal function. Almost 20% felt it should be a state responsibility while over 10% indicated it should be primarily the responsibility of the federal government.

In summary, the study showed that among those responding to the survey, there is general agreement that the requirements presented for operators, in-home care, and administering agencies were reasonable. Those requirements judged too weak or too strong in many instances could be reworded to be more reasonable without losing their intent. The major obstacle to requirement acceptance continues to be in the area of child-staff ratios. Caregiver competence, and parent involvement requirements also need further study before they should be applied. The staff issue will not be resolved easily because it has the greatest impact on the development of children and on the economics of child care.

*Dr. Jerry Southard is Manager of Child Development Programs for the Texas Department of Public Welfare, Austin.

COMPARATIVE SUMMARY OF RESPONSES TO ALL REQUIREMENTS *


SECTION I: Requirements for Operators
SECTION II: Requirements for Administering Agencies
SECTION III: Requirements for In-Home Care
A. Meeting Code Requirements
B. Ensuring Safety of Buildings and Premises
C. Duration of Stay in Day Care
D. Ensuring Continuing Development of Children
E. Ensuring Continuity with Home and School
F. Ensuring Adequate Rest for Children
G. Ensuring Adequate Nutrition
H. Ensuring Sanitary Food Service
I. Preventing Accidents
J. Ensuring Care in Emergencies
K. Accounting for Supervision of Children
L. Providing Sufficient Caregivers (Family Day Homes)
Providing Sufficient Caregivers (Centers - 1972 FIDCR)
Providing Sufficient Caregivers (Centers - Title XX FIDCR)
M. Ensuring Competence of Caregivers
N. Ensuring the Accountability of Operators
O. Ensuring a Healthy Staff
P. Admissions Procedures
Q. Ensuring Parent Participation in Decision Making
A. Ensuring Compliance with Requirements
B. Arranging Health Services
C. Arranging Psychological and Social Services
D. Providing Training
E. Ensuring Parent Participation in Decision Making
F. Ensuring Transportation Safety
I.M. Ensuring the Competence of Caregivers
II.D. Providing Training
II.B. Arranging Health Services
II.C. Arranging Psychological and Social Services
I.O. Ensuring a Healthy Staff
100%
90%
80%
70%
60%
50%
40%
30%
20%
10%
0%
CODE: ---- Too Strong ▬▬ Reasonable .... Too Weak —— Undecided

* Designed by S.M. (Pat) Murphy.